



Control Number: 48785



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**BEFORE THE STATE OFFICE**

OF

## ADMINISTRATIVE HEARINGS

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Commission Staff (Staff) of the Public Utility Commission of Texas (Commission) requests that LCRA Transmission Services Corporation (LCRA TSC) and AEP Texas Inc. (AEP Texas), by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

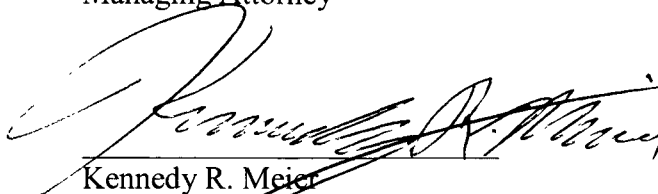
November 29, 2018

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney

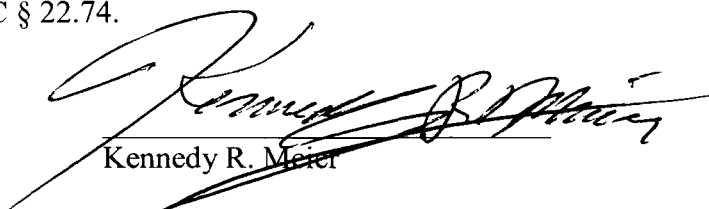


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**SOAH CONSOLIDATED DOCKET NO. 473-19-1265  
PUC CONSOLIDATED DOCKET NO. 48785**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on November 29, 2018, in accordance with 16 TAC § 22.74.



Kennedy R. Meier

**SOAH CONSOLIDATED DOCKET NO. 473-19-1265**  
**PUC CONSOLIDATED DOCKET NO. 48785**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LCRA TRANSMISSION SERVICES CORPORATION (LCRA TSC) AND  
AEP TEXAS INC. (AEP TEXAS) QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-3**

**DEFINITIONS**

- A. "LCRA TSC," "AEP Texas," "the Company," or "you" refers to LCRA Transmission Services Corporation and AEP Texas Inc. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1      Do LCRA and AEP prefer to construct the proposed Bakersfield to Solstice line in such a way as to avoid crossing land managed by University Lands? If so, please explain in detail the reasoning for the preference.
- Staff 1-2      Besides the University Lands letter attached to Sonya Strambler's testimony as Exhibit SS-6, have LCRA or AEP had any additional communications with University Lands regarding the proposed Bakersfield to Solstice line? If so, please provide a copy of all such communications.
- Staff 1-3      Please refer to the Texas Department of Transportation's (TxDOT's) February 1, 2018 letter to Ms. Lisa Barko Meaux included in Appendix A to the Environmental Assessment for the Bakersfield to Solstice line. Specifically, please refer to TxDOT's statement that its "right of way contains ecologically sensitive areas, labeled with 'non mow area' signs in the field, on US 67 approximately 6 miles north of IH 10, and on SH 18 approximately 10 miles north of Fort Stockton. These areas should be avoided."
- a) Has TxDOT or another entity provided additional information regarding these ecologically sensitive areas? If so, please provide copies of this information.
- b) Are LCRA or AEP aware of what specifically makes these areas ecologically sensitive? If so, please explain.
- c) Which particular segments of the alternative routes, if any, cross these areas?